

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

MASTER DOCKET  
18-md-02865-LAK

This document relates to: The cases identified in Appendix A

**NOTICE OF DEFENDANT'S MOTION TO EXCLUDE THE PROPOSED EXPERT  
REPORTS, OPINIONS, AND TESTIMONY OF BRUCE DUBINSKY**

**PLEASE TAKE NOTICE**, that upon the accompanying Declaration of Michael M. Rosensaft dated June 21, 2024, and the exhibits attached thereto; that upon the accompanying Memorandum of Law, dated June 21, 2024; and upon all prior pleadings and proceedings had herein, Defendants, through the undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the court, for an order excluding the testimony of Bruce Dubinsky pursuant to Federal Rules of Evidence 702. Defendant respectfully requests oral argument regarding this motion.

Dated: New York, New York  
June 21, 2024

Respectfully submitted,

KATTEN MUNCHIN ROSENMAN LLP

By: /s/ David L. Goldberg  
David L. Goldberg  
Michael M. Rosensaft  
50 Rockefeller Plaza  
New York, NY 10020  
Tel.: (212) 940-8800  
Fax: (212) 940-8776  
[david.goldberg@katten.com](mailto:david.goldberg@katten.com)

*Attorneys for Defendants Robert Klugman, RAK Investment Trust, Aerovane Logistics LLC Roth 401K Plan, Edgepoint Capital LLC Roth 401K Plan, Headsail Manufacturing LLC Roth 401K Plan, The Random Holdings 401K Plan, The Stor Capital Consulting LLC 401K Plan*